

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

JOHN DOE,
Plaintiff,

v.

Case No.: 6:14 – cv00052 - NKM

WASHINGTON AND LEE UNIVERSITY,
Defendant.

MOTION FOR CONSENT PROTECTIVE ORDER

Defendant Washington and Lee University, by counsel, pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, and upon agreement and consent of the Plaintiff, John Doe, by counsel, hereby moves the Court to enter a protective order regarding documents to be produced by the parties to one another in the process of discovery. A copy of the proposed Consent Protective Order is filed with this motion, and will be emailed to the Court for entry.

We ask for this:

s/ R. Craig Wood
R. Craig Wood, Esq.
Virginia State Bar No. 24264
McGuireWoods LLP
310 Fourth Street, N.E., Ste. 300
P. O. Box 1288
Charlottesville, VA 22902
(434) 977-2558
(434) 980-2274 (Facsimile)
cwood@mcguirewoods.com

Attorney for Defendant

Seen and agreed:

s/ G. Robert Gage, Jr
G. Robert Gage, Jr. (NY Bar No. 1901412)
Gage Spencer & Fleming, LLP
410 Park Ave, Suite 900
New York, NY 10022-9492
grgage@gagespencer.com
(212) 768-4900

s/ Joseph B. Evans
Joseph B. Evans (NY Bar No. 5221775)
Gage Spencer & Fleming, LLP
410 Park Ave, Suite 900
New York, NY 10022-9492
jevans@gagespencer.com
(212) 768-4900

s/ David G. Harrison
David G. Harrison, Esq. (VSB # 17590)
The Harrison Firm, PC
5305 Medmont Circle, SW
Roanoke, VA 24018-1120
david@harrisonfirm.us
(540)777-7100